



PELTON GRAHAM LLC

ADVOCATES FOR JUSTICE

September 10, 2020

Brent E. Pelton, Esq.
Pelton@PeltonGraham.com

VIA ECF

Honorable Cheryl L. Pollak
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: *Carlos Obispo Guinea v. Sagal Meat Market VII, Inc., et al.*
Civil Action No. 19 Civ. 3448 (ARR)(CLP)

Dear Judge Pollak:

This office represents the plaintiff in the above-referenced action. We write, jointly with Defendants, pursuant to Your Honor's August 10, 2020 Order, to provide the Court with a status update.

As Your Honor is aware, the parties sought a referral to the EDNY Mediation Program at Dkt. 20 on April 6, 2020, which the court granted. The parties held a formal Mediation session before Mediator Giulio Zanolli on July 7, 2020, along with further post-mediation settlement discussions. Unfortunately, the parties were not able to resolve the claim as factual and legal issues remain in dispute. As such, the parties are now engaged in written discovery with Plaintiffs' demands and deposition notices having been sent on August 26, 2020.

We appreciate Your Honor's attention to this matter and believe that an updated discovery schedule is appropriate. The parties have discussed and propose a close of discovery date of December 17, 2020. Should you have any questions regarding this submission, please feel free to contact the undersigned.

Respectfully submitted,

/s/ Brent E. Pelton

Brent E. Pelton, Esq. of
PELTON GRAHAM LLC

cc: All Counsel (via ECF)